

I remain **in support** of the FCC's proposed action to **remove** Morse Code proficiency testing from **all** classes of Amateur Radio licenses.

I will now informally address a few of the arguments against the FCC's proposal.

“Due to its narrow bandwidth, technological simplicity and use of shorthand codes understandable to people with limited English skills, Morse Code should be retained as a licensing requirement to ensure better communications in emergency situations”

Response: This *non sequitur* makes the opposite conclusion that it should from the evidence given. Having the most *effective* means of communications requires a cadre of operators with equipment. Restricting the number of available operators through an archaic requirement works *contra* to the principles of emergency amateur radio operations in 47CFR97.403 and 47CFR97.405.

To have *effective* emergency communications, operators must first have the equipment (i.e. transceivers and antennas) for the necessary frequencies. When tens of thousands of interested individuals are turned away due to unnecessarily restrictive licensing practices, the **public** pays the price in terms of needless loss of life and property that may have been averted had more operators and communications equipment been available.

Having a more merely spectrally efficient mode of operation is meaningless when insufficient resources exist to take advantage of that mode.

The spectral efficiency arguments seem to argue in terms of bandwidth required, and fail to consider the *time* required to communicate. When the communications network is sparse because so many potential operators have been disenfranchised through the irrelevant Morse Code testing requirement, time is **wasted** through network bottlenecks and holes (too few operators with too many messages in queue, or no one to receive the message at all). If currently disenfranchised operators have a larger and more robust digital network in operation, the true efficiency of the system considering the time and reliability of passing messages **greatly increases**.

During an emergency, any reasonable person would rather see more bandwidth being used by more operators to get information from point to point in a timely manner, rather than waiting for a few CW operators pecking away in Morse Code, with a hopelessly high stack of messages in queue.

The FCC should encourage investment in long-range (i.e. HF Radio Amateur) timely emergency communications by immediately removing the archaic and irrelevant Morse Code testing requirement.

“Morse Code is a great tradition in Amateur Radio, the second-most frequently used mode”

Response: That's nice, but how is tradition of the past century relevant to the *immediate* emergency communications needs of Americans?

The FCC should modernize its Amateur Radio testing requirements by removing Morse Code testing.

“Millions of CB-style operators will flood the bands, causing interference...”

Response: There is no evidence that easing entry requirements will introduce a disproportionate amount of “bad” operators. It is true, there is a minority of CB Radio users that engage in grossly illegal activity, even operating up into the 10 meter amateur band. I do not believe any kind of study has been undertaken to determine the percentage of illegal operations on the CB Radio service that cause significantly deleterious effects on legal CB Radio communications. Overall, CB Radio fulfills its stated goal of being a short-range (1-5 mile) communications service, saving untold millions of dollars and hundreds of lives each year through avoidance of highway accidents. Countless CB Radio operators spread through rural and urban areas spread goodwill through safety and community relevant communications. Many elderly shut-ins use CB Radio for stimulating conversation, increasing their quality of life.

Generally speaking, it is the *quality* CB Radio operators that express interest in amateur radio. They want to increase the range of their friendly, community-benefiting communications legally, beyond the range limitations of CB Radio. Increases in the amateur population from CB Radio will also help economies of scale in equipment along with making more operators available for emergency communications—a total *win-win* scenario.

Nearly all operators today, including those with a “no-code” technician license operate under the letter and spirit of 47CFR97. An examination of FCC enforcement records may prove interesting to see what, if any benefit is provided by disenfranchising operators from HF privileges through an ineffective requirement (i.e. see what ratio of actions are taken against Tech-Plus and higher operators relative to “No-Code” Technicians).

It is well known that only one appropriately situated malicious operator can shut down or greatly impede long-range communications on a frequency, as referred to in numerous FCC enforcement actions. Having a larger cadre of equipped HF operators such as would result from eliminating irrelevant Morse Code testing would help mitigate such interference—a denser network helps overcome the interference by relaying traffic station to station.

There is no evidence that removing an archaic, obsolete requirement will unleash a disproportionate flood of illegal operators—the public stands only to benefit from the FCC proposal to eliminate Morse Code testing.

“We need trained Morse Code operators in emergencies”

Response: In addition to the above arguments, a small cadre of inexperienced 5 Word per Minute Morse Code operators is going to be **greatly** *less efficient* at passing emergency traffic than a larger cadre with 300 or 1200 baud data communications, voice, or even simple 31 baud PSK communications.

I am not aware of any scientific studies done to ascertain what ratio of potential operators is discouraged by Morse Code testing. Anecdotal evidence indicates that roughly 3 out of 4 that would potentially go on to HF operations are discouraged by the Morse Code testing requirement. This is a staggering detriment to the Amateur Radio emergency service mission. The FCC should move quickly to modernize Amateur Radio entrance requirements by eliminating Morse Code.

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